

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

GERARD MORRISON, et al.,)	
)	
Plaintiffs,)	
)	Civil Action No. 1:14cv5
v.)	
)	Judge Hilton
COUNTY OF FAIRFAX, VA.,)	Magistrate Judge Anderson
)	
Defendant.)	
)	
_____)	

JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT

Plaintiffs and Defendant, County of Fairfax, Virginia, by counsel, jointly move the Court to enter an Order approving their tentative Settlement Agreement which will be finalized provided that (1) no Plaintiff submits a valid objection to the proposed settlement, which is accepted by the Court at the Fairness Hearing scheduled for December 2, 2016, and (2) the County's Board of Supervisors then approves the proposed settlement at its December 6, 2016, meeting.

The grounds for this Joint Motion are fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,

ALL PLAINTIFFS:

By: /s/ Molly A. Elkin
Molly A. Elkin (Va. Bar No. 40967)
Sara L. Faulman
WOODLEY & MCGILLIVARY LLP
1101 Vermont Avenue, N.W.
Suite 1000
Washington, DC 20005
Phone: (202) 833-8855
mae@wmlaborlaw.com

Counsel for Plaintiffs

COUNTY OF FAIRFAX, VIRGINIA

By: /s/ Sona Rewari
Sona Rewari (VSB No. 47327)
HUNTON & WILLIAMS LLP
1751 Pinnacle Drive
Suite 1700
McLean, Virginia 22102
(703) 714-7512
(703) 918-4018 (facsimile)
srewari@hunton.com

Evangeline C. Paschal (pro hac vice)
HUNTON & WILLIAMS LLP
2200 Pennsylvania Avenue, N.W.
Washington, D.C. 20037
(202) 419-2174
(202) 778-7433 (facsimile)
epaschal@hunton.com

Ann G. Killalea, Assistant County Attorney
(VSB No. 23913)
12000 Government Center Parkway, Suite 549
Fairfax, Virginia 22035
(703) 324-2421
(703) 324-2665 (facsimile)
ann.killalea@fairfaxcounty.gov

Counsel for County of Fairfax, Virginia

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of November, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Molly A. Elkin

Molly A. Elkin (Va. Bar No. 40967)

WOODLEY & MCGILLIVARY

1101 Vermont Avenue, N.W.

Suite 1000

Washington, DC 20005

Phone: (202) 833-8855

mae@wmlaborlaw.com

Counsel for Plaintiffs